



Kansas Relay Service, Inc.

700 SW Jackson Street, Suite 704

Topeka, Kansas 66603-3758

Voice 785-234-0307 • TDD 785-234-0207 • Fax 785-234-2304

May 13, 2003

Ms. Erica Myers
Federal Communications Commission
Disability Rights Office
445 12th Street S. W., Room 6-C212
Washington, D. C. 20554

Dear Ms. Myers:

This correspondence is in response to the May 1, 2003 correspondence sent to our office from Thomas E. Chandler, Chief, Disability Rights Office, Consumer and Governmental Affairs Bureau. This correspondence was received in our office on May 9, 2003.

Mr. Chandler was requesting additional information from us concerning our APPLICATION FOR RENEWAL OF STATE TRS PROGRAM CERTIFICATION. His correspondence instructed us to direct our responses to you by May 15, 2003.

This is to be considered further filing with regard to **DOCKET 98-67**. I am also enclosing the disk copy described in Mr. Chandler's letter, and I will file electronically and will further e-mail you a copy of this filing at emyers@fcc.gov.

Please let me know if you require additional information. Thank you.

Sincerely yours:

Michael Byington
Director of KRSi, and Kansas Telecommunications Access Program

MB/mb

Encl

Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Telecommunications Services for)
Individuals with Hearing and)
Speech Disabilities, and the)
Americans with Disabilities Act)
of 1990)
_____)

CC Docket No. 98-67

ADDENDUM TO APPLICATION FOR RENEWAL OF
STATE TRS PROGRAM CERTIFICATION
STATE OF KANSAS
APPLICATION 07-02

STATE: KANSAS

APPLICANT: KANSAS RELAY SERVICE, INC. (KRSI)

DATE: MAY 13, 2003

On September 26, 2002, the Kansas Relay Service, Inc. (KRSi) submitted its application for renewal of state TRS program certification. On May 9, 2003, KRSi received correspondence from Thomas E. Chandler, Chief, Disability Civil Rights Office, Consumer and Governmental Affairs Bureau. Identifying three areas where additional information is needed for renewal of certification. The areas noted by Mr. Chandler are as follows:

"64.604(a)(6)

CA Gender Preference: Each State TRS program must make best efforts to accommodate a TRS users requested CA gender preferences when a call is initiated, and if transfer occurs, at the time the call is transferred to another CA. **Please indicate how your state makes best efforts to accommodate a TRS user's requested gender preference, and provide any relevant documentation.**

64.604(a)(7)

STS Called Numbers: Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the

telephone number to the STS user. This information must be transferred to any new STS provider. **Please provide documentation that demonstrates that your state TRS provider meets this rule.**

64.604(c)(2)

Contact Persons: Each state TRS program must submit to the Commission a contact person or office for TRS consumer information and complaints about intrastate TRS. This submission must include, at a minimum, the name and address of the state office that receives complaints, grievances, inquiries, and suggestions, voice and TTY numbers, FAX number, e-mail address, and physical address to which correspondence should be sent. **Please submit your state's contact information."**

We will provide sections responding to each of Mr. Chandler's requests for additional information, and will transmit all such documentation to Erica Myers per direction in Mr. Chandler's letter. We will also provide, as a part of this same electronic document, and in hard copy, certain attachments which will be referenced in our responses.

"64.604(a)(6)

CA Gender Preference:

Our contracted provider of TRS in Kansas is SBC Communications. Gender preference requirements as stated in 64.604(a)(6) are met. The Policy and Procedures Manual at the Kansas Relay Center, operated by SBC Communications, requires as follows:

"8. Gender Request

If a customer requests an operator of the opposite sex other than the current operator, ring for in-charge. Inform in-charge that the customer wants a different gender, and s/he will see if the requested gender operator is available to handle the call. If the opposite gender is not available, inform the customer. If the customer asks to have the call transferred, explain that it is not possible to transfer to another position for the opposite gender. If the customer says s/he will hang up and call back, explain that is fine but there is no guarantee the next operator will be the gender s/he is requesting."

I will explain this procedure statement a little further and provide some information so that it may be interpreted in the proper context. Our TRS provider does NOT adhere to the practice of placing calls on hold and transferring calls from CA position to CA position. If a different gender is requested, CAs actually change position stations so that there is no hold or transfer time involved. This is consistent with the "best effort" requirement. The only time a caller is asked to call back or accept a gender CA other than the variety requested is if no CA of the gender requested is available because any such gendered individuals who are working have just started what appear to be lengthy calls. In the vast majority of instances, gender requests are handled smoothly by supervisors with no hold or transfer time.

64.604(a)(7)

STS Called Numbers:

SBC Communications sub-contracts with AT&T for speech to speech services. The information provided here is therefore from AT&T even though SBC is our contracted provider.

The AT&T Relay Choice Profile form is **ATTACHMENT A**. This is normally completed on line via a website. If the user is not a computer user, however, AT&T has the following policy for completion of this form. This information is provided by AT&T in a question and answer format.

"Are profiles available to those who do not have computers or access to the web?

Yes. Any relay customer, including STS customers, can request a Relay Choice Profile.

What are the procedures for setting up Relay Choice Profile (RCP) (those users without web access)?

Relay customers, including STS customers, that want to set up an RCP should contact the AT&T Relay National Customer Care Team in the following ways:

Call AT&T Relay National Customer Care Team via telephone at:

- VOICE: 1-800-682-8706
- TTY: 1-800-682-8786
- FAX: 1-888-288-2184

If the representatives are busy, the caller should leave a message. The National Customer Care Team member will contact the STS user, and set-up the profile on their behalf. For your information, the RCP system takes from 24-48 hours to update the profile."

The above information has been provided by Teresa Feeney, AT&T Relay Services. Ms. Feeney also has provided the following information concerning the repeating of names and numbers called,

"Relay Providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers, which the STS user calls.

We offer this option to all relay customers, including STS customers, via the Relay Choice Profile, which is computerized in our system. In order to protect customer privacy and confidentiality, no paper records are kept at the Relay Center. The Relay Choice Profile fulfills this requirement while ensuring customer information is held in the strictest confidence.

STS CA must repeat the name and state the telephone number to the STS user.

We are familiar with the verbiage and are in compliance with the requirement. Whenever any STS user, including any Kansas STS user, calls the STS CA and requests a number from their personal memory dial list, the STS CA will repeat the name and number back to the STS customer."

64.604(c)(2)

Contact Persons:

In the initial APPLICATION FOR RENEWAL OF STATE TRS PROGRAM CERTIFICATION document, submitted September 26, 2002, we provided the following contact information:

" F. CONSENT OF KANSAS CORPORATION COMMISSION AND POINT OF CONTACT.

The Kansas Corporation commission has authorized KRSI to submit this application. The KCC recognizes KRSI as the proper party to seek certification as a "state program" in accordance with 47 C.F.R. §64.605. (See ATTACHMENT A.) The signer and contact information below represents the person responsible for KRSI operations, and represents the official contact information for KRSI.

Michael Byington
Director
Kansas Relay Service, Inc.
700 SW Jackson St. - Suite 704
Topeka, Kansas 66603-3758
(785) 234-0307 (voice)
(785) 234-0207 (TTY)
byington@kstelecom.com"

Apparently, however, we failed to note that this is a contact for purposes of TRS consumer information and complaints. We apologize for this omission, but this is the contact for such issues.

ATTACHMENT B is a copy of an e-mail on October 29, 2002. Apparently, however, this information was not sufficient in detail as I received a telephone request from Ms. Dana Jackson, of the FCC staff, on April 21, 2003 that additional contact information was needed. I thus sent Ms. Jackson the memo noted here as **ATTACHMENT C.**

All of this previously submitted documentation now requires a clarification. Our voice telephone contact numbers for the KRSi office are listed as (785) 234-0307 in one document and as (785) 234-0200 in another document. Both of these are correct, working voice numbers. Our TTY number remains (785) 234-0207, and our FAX number remains (785) 234-2304.

A finalized copy of our contact information is thus as follows:

The contact information concerning complaint and contract administration issues is:

Michael Byington, Director
Kansas Relay Service, Inc. (KRSi)
700 S. W. Jackson, Suite 704
Topeka, Kansas 66603
(785) 234-0200 voice
(785) 234-0207 (TTY)
(785) 234-2304 (FAX)
byington@kstelecom.com.

Our contract for telecommunications relay service in Kansas continues to be with SBC Communications. The contact for direct service issues, other than complaints, which one wishes to file with the contract administrator, is:

David Rosenthal, External Affairs Area Manager
Kansas Relay Center
SBC Communications
734 Vermont Street
Lawrence, Kansas 66044
(785) 865-3274 (TTY administrative number directly to Mr. Rosenthal)
(785) 841-0601 (FAX)
dr7879@ksmail.sbc.com

CONCLUDING COMMENTS AND CERTIFICATION OF AUTHORITY:

The Kansas Corporation commission (KCC) has authorized KRSi to submit the APPLICATION FOR RENEWAL OF STATE TRS PROGRAM CERTIFICATION for the State of Kansas. The KCC recognizes KRSI as the proper party to seek certification as a "state program" in accordance with 47 C.F.R. §64.605. KRSi is therefore authorized also to respond to any requests for addenda or additional information requested or required concerning renewal of State TRS Certification. The signer and contact information below, as stated elsewhere in this document, represents the person responsible for KRSI operations, and represents the official contact information for KRSI.

Michael Byington
Director
Kansas Relay Service, Inc.
700 SW Jackson St. - Suite 704
Topeka, Kansas 66603-3758
(785) 234-0200 (voice)
(785) 234-0207 (TTY)
byington@kstelecom.com"

ATTACHMENT A:
AT&T RELAY SERVICE - RELAY CHOICE PROFILE

AT&T Relay Service – Relay Choice Profile

Please complete the entire form.

Step 1

1. Please check which applies to you:

New RCP

Update RCP

Remove RCP

2. Standard Profile – Please provide your telephone number-**area code first**

3. Multi-User Profile – Pick this option if there is more than one relay user in your household. Please pick four-digit PIN number to have your multi-user profile set up

4. If you would be willing to provide your email address so that you could be emailed information on AT&T's Relay Services, please enter it below. These messages would not be frequent and your email address would not be used for any other purpose.

5. Please provide a **password** for identification (password may be 4 to 8 characters long and can be numbers, letters or a combination of both.

Step 2

6. Please select your preferred **long-distance telephone service carrier**. *(By not making a selection, you are choosing AT&T as your long-distance carrier for relay.)* If your long distance carrier isn't listed, they have chosen not to participate in the TRS Carrier of Choice program. By making this selection, you are not changing your current long-distance carrier for calls made from your home telephone, which do not use relay service. *(See page 4 for a list of carriers)*

7. Please select your **regional telephone service carrier**. Remember that regional service is the telephone service outside your local calling area, but not long distance. *(By not making a selection you are choosing AT&T as your regional telephone service carrier for relay services).* Some telephone carriers may not be available in all areas. By making this selection, you are not changing your current regional carrier for calls made from your home telephone, which do not use relay service.

Relay Choice Profile, continued

8. Every time I call relay, or receive a relay call, I prefer to use: (choose one)

PC/ASCII	Yes	No	TTY/VCO	Yes	No
PC/ASCII/2LVCO	Yes	No	TTY/2LVCO	Yes	No
STS	Yes	No	TTY/HCO	Yes	No
TTY (Baudot/Turbocode)	Yes	No	VOICE	Yes	No

9. Every time I use relay, I would like my calls to have the following features:

Language Type: (select one)

- Verbatim: CA to verbalized typed msg word for word Yes No
- Typed ASL to English and English to typed ASL Yes No
- Spanish to Spanish Yes No
- CA to identify background noise Yes No
- Spelling Check Yes No
- Explain Relay on each call Yes No
- CA to type slowly Yes No

10. Dial Out Restrictions: Please select the following types of calls that **you do not want made** from your telephone number:

900 976 Other:
International

11. Caller ID: Please select how you would like your telephone number to appear on Caller ID units when you place calls: Block My Number Send My Number
Send Relay Number

12. If you would like to add special instructions such as: prefer male or female CA, personal announcement phrase to announce your relay call, or to retrieve your voice mail, please type them in the box below. You will be contacted by an AT&T Relay Staff member to discuss your special instructions.

Please keep in mind that special instructions provided is not guaranteed for each relay call contingent on the relay-calling situation. The AT&T Relay staff will do their best to accommodate your special instructions.

Relay Choice Profile, continued

Step 3

13. **Speed Dialing:** Please list the names and telephone numbers that you call frequently that become your **personal memory dial list**. You can tell the CA, “call dad”, and they will dial the number. (You may store up to 20 names)

Name (40 letters or less)	Phone Number Please include area code)
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12.	
13.	
14.	
15.	
16.	
17.	
18.	
19.	
20.	

THANKS! Your Relay Choice Profile should be activated within 48 hours!

You can MAIL this form to: **AT&T Relay Services – Customer Service**
100 S. Jefferson Street, Suite 115
New Castle, PA 16101

You can FAX this form to: **1-888-288-2184**

You can CALL AT&T Relay Services with questions about this form at:

1-800-682-8786 (TTY)
1-800-682-8706 (VOICE)

You can enter via the WEB at **www.att.com/relay**

Relay Choice Profile - Additional information:

Password

All the information you enter into the Relay Choice Profile will be kept confidential unless required by law. No one but you can access it. This password must be between four and eight characters long. It can be numbers, letters or a combination of both. With this password, only you can change or update your profile.

Personal Memory Dial List / Speed Dialing

With this convenient memory dial list, you can store up to 20 frequently dialed telephone numbers in the Relay Choice database. When you place the call to anyone on that list, you only tell the Communications Assistant whom to call. With memory dial, you can store frequently dialed numbers and even request that the CA dial them by name.

Voice Carry Over (VCO)

This profile is great for TTY and VCO phone users who want to speak for themselves. To make a call, VCO users should first type the number they want to call (VCO will already be turned on). When the CA comes online, the VCO user can speak. The CA then types the standard telephone user's response back. Best of all, when VCO users receive the call, they'll be able to answer the phone by speaking naturally because this feature will be automatically connected.

Hearing Carry Over (HCO)

This allows TTY users who can hear to listen to the other person on the phone directly. The CA then voices the TTY user's typed response back to the voice caller.

Communications Preference

A time-saving benefit that enables you to be automatically connected in the mode in which you called. In other words, if you always use your TTY (baudot) you will be connected as TTY (baudot). Other connection preferences include: PC (ACSII), PC (ASCII)/2LVCO, STS, TTY/VCO, TTY/2LVCO, TTY/HCO, Voice, Phone.

Carrier Preference

This feature lets you specify which long-distance and regional telephone carriers you are using for relay services, such as AT&T. By entering the carrier of choice in your profile, you can save time up front and avoid billing confusion later. **Please note, not all carriers are available for every AT&T Relay state.** Current carriers include:

AT&T	ALLNET/FRONTIER
COX (Bus)	COX (Res)
CLEAR CHOICE FIVE TALK 10-10	LDDS
MCI	METROMEDIA
QWEST	SPRINT
TELCOMM USA 10-10	VARTEC
VERIZON	WILTEL
	WORLDXCHANGE 10-10

*Spelling Correction

A great new feature for TTY and ASCII users. It automatically spell checked and corrects certain words misspelled by the CA. On your screen, you would see only the corrected word, which results in clearer conversation.

*Background Noise

This feature instructs the CA to communicate any appropriate sounds – laughter, for example – that can be deleted over the telephone in addition to the spoken words from the voice user. It provides you with additional information. Some people prefer not to be informed about background noise. As a profile feature, you will be able to turn background noise off.

CA to type slowly

Also known as **Text Pacing**. This feature is specific for vision impaired (e.g. Deaf/Blind) and elderlys who want the CA to type slowly for ease of reading the text message.

Relay Choice Profile - Additional information:

Language Type

This tells the CA which type of language you prefer when using AT&T Relay. (Choose only one.)

**Does not apply to STS users*

ATTACHMENT B:

**OCTOBER 29, 2002 E-MAIL TO FCC FROM MICHAEL BYINGTON:
CORRECTIONS TO KANSAS TELECOMMUNICATIONS RELAY PAGE**

From: "Michael Byington" <byington@kstelecom.com>
To: <fccinfo@fcc.gov>
Subject: Corrections to the Kansas Telecommunications Relay page
Date: Tuesday, October 29, 2002 10:50 AM

I am the administrator and contact for administration of the contract for Telecommunications Relay Services (TRS) in Kansas. I checked the FCC Web page today to make sure that our TRS certification application was up properly, and in doing so, I noticed errors in some of the contact information on the KANSAS TRS page. The correct information has been e-mailed previously, and is contained in both our complaint logs and our certification application but has not yet made it into the contact section. First of all, the e-mail address has changed. Rob Hodges, former administrator for the contract has vacated that position several months ago. The e-mail address you have listed will no longer work. The proper e-mail address is byington@kstelecom.com. Also, (785) 234-0307 is our voice only telephone number. The TTY number is correctly listed as (785) 234-0207, but the 0307 number should NOT listed as voice of TTY.

I do not really suppose many people will procure information to contact us through that source, but for the benefit of accuracy, I wanted to point out the need for update. Thank you. ^

ATTACHMENT C:

**APRIL 21, 2003 MEMO TO DANA JACKSON, FCC, FROM MICHAEL
BYINGTON CONCERNING CONTACT INFORMATION FOR RELAY IN
KANSAS**



Kansas Relay Service, Inc.

700 SW Jackson Street, Suite 704

Topeka, Kansas 66603-3758

Voice 785-234-0307 • TDD 785-234-0207 • Fax 785-234-2304

April 21, 2003

TO: Dana Jackson
Federal Communications Commission (FCC)

FROM: Michael Byington, KRSi Director

SUBJECT: Contact for telecommunications relay in Kansas

You informed me by telephone today that the FCC needs updated contact information concerning the contract administration for telecommunications relay service in Kansas. The contact information concerning complaint and contract administration issues is:

Michael Byington, Director
Kansas Relay Service, Inc. (KRSi)
700 S. W. Jackson, Suite 704
Topeka, Kansas 66603
(785) 234-0200 voice
(785) 234-0207 (TTY)
(785) 234-2304 (FAX)
byington@kstelecom.com.

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SBC Communications
734 Vermont Street
Lawrence, Kansas 66044
(785) 865-3274 (TTY administrative number directly to Mr. Rosenthal)
(785) 841-0601 (FAX)
dr7879@ksmail.sbc.com

I did provide the FCC with this updated information some time ago by both e-mail and snail mail. I do not recall as I write this to whose attention the previous contacts were directed, so perhaps I sent them to the wrong person or office. I apologize for your not having received this information earlier, however.

The former contact for contract administration and complaint issues was listed as Robert R. Hodges. The telecommunications relay service contract administration duties have been passed gradually to me over the past year to year and a half. Mr. Hodges served as President of the KRSi Board of Directors and Executive Officer for KRSi through August 2001. Mr. Hodges, however hired me as KRSi Director, in August 2001, although he retained his position as President of the KRSi Board. Mr. Hodges left Kansas in May 2002 and officially resigned as KRSi Board President as of October 2002. Although there is of course a new president of the KRSi Board of Directors who supervises me, Anne Spiess, all contact responsibilities transferred to me as of October 2002.

Thank you. Please let me know if you have questions.

